## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

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Kevin Rocheville

\*

v.

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Civil Action No. 19-CV-01169-PB

Thomas Goulden, Matthew Keenliside,

Brian McCarthy, Joseph O'Roark,

Michael McCall, Allison Caprigno,

Jody Harris-Stern, John Does,

Jane Does, and Town of Pelham, NH

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## <u>ASSENTED-TO MOTION TO EXTEND TIME</u> TO ANSWER OR OTHERWISE RESPOND TO DECEMBER 16, 2019

NOW COME Defendants Thomas Goulden, Matthew Keenliside, Brian McCarthy, Joseph O'Roark, Michael McCall, Allison Caprigno, and Town of Pelham, and respectfully request their deadline to respond to the Complaint be extended to December 16, 2019. In support hereto, Defendants state as follows:

- 1. Undersigned counsel was recently engaged to represent Defendants in this action and he requires a short extension of time to prepare and file a meaningful response to the Complaint.
- 2. The requested extension will not significantly delay the matter and will not impact any discovery or trial deadlines, none having been set at this time.
  - 3. Plaintiff's counsel has <u>assented</u> to this motion.

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4. No memorandum of law is filed in support of this motion as the relief requested is within the discretion of the Court.

## WHEREFORE, Defendants respectfully requests that this Court:

- A. Extend Defendants' deadline to answer to December 16, 2019; and
- B. Grant such further relief as justice requires.

Respectfully submitted,

THOMAS GOULDEN, MATTHEW KEENLISIDE, BRIAN MCCARTHY, JOSEPH O'ROARK, MICHAEL MCCALL, ALLISON CAPRIGNO, and TOWN OF PELHAM

By their Attorneys,

CULLENCOLLIMORE, PLLC

Dated: November 26, 2019 By: /s/ Brian J.S. Cullen

Brian J. S. Cullen, NH Bar # 11265 10 East Pearl Street Nashua, NH 03060 (603) 881-5500 bcullen@cullencollimore.com

## **CERTIFICATE OF SERVICE**

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record

Dated: November 26, 2019 /s/ Brian J.S. Cullen

Brian J.S. Cullen